

THE HONORABLE JOHN H. CHUN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

NXP USA, INC. and NXP B.V.,

Plaintiffs,

v.

IMPINJ, INC.,

Defendant.

No. 2:20-cv-01503-JHC

**JOINT MOTION TO ENTER SOURCE  
CODE STIPULATION**

NOTE FOR MOTION CALENDAR:  
JANUARY 9, 2023

1 Pursuant to Local Rules 7(d)(1) and 10(g), Plaintiffs NXP USA, Inc. and NXP B.V.  
2 (collectively “NXP”) and Defendant Impinj, Inc. (“Impinj”) respectfully request that the Court  
3 enter an order adopting the parties’ Stipulation Regarding Impinj, Inc.’s Circuit Schematics and  
4 Source Code, attached hereto as Exhibit A.  
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2 DATED: January 9, 2023

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***Attorneys for NXP USA, Inc. and NXP B.V.***

1 PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

2 DATED: January 9, 2023

3   
4 Hon. John H. Chun  
5 United States District Court Judge  
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# EXHIBIT A

HONORABLE JOHN H. CHUN

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

NXP USA, INC., and NXP B.V.,

Plaintiffs,

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IMPINJ, INC.,

Defendant.

NO. 2:20-cv-01503-JHC

STIPULATION REGARDING IMPINJ, INC.'S  
CIRCUIT SCHEMATICS AND SOURCE  
CODE

1 Defendant Impinj, Inc. (“Impinj”) stipulates as follows:

- 2 1. Impinj produced circuit schematics in a document titled [REDACTED].pdf that bears  
3 bates numbers IMPINJ\_NXP\_WDTEX\_00006191 to  
4 IMPINJ\_NXP\_WDTEX\_00006515. This document represents the circuitry contained  
5 in the M730 and M750 products.
- 6 2. Impinj produced circuit schematics in a document titled [REDACTED].pdf that  
7 bears bates numbers IMPINJ\_NXP\_WDTEX\_00006038 to  
8 IMPINJ\_NXP\_WDTEX\_00006190. This document represents the circuitry contained  
9 in the Monza 4D, Monza 4E, Monza 4I, Monza 4QT, Monza 4E Dura, and Monza 4QT  
10 Dura products.
- 11 3. Impinj produced circuit schematics in a document titled [REDACTED].pdf that  
12 bears bates numbers IMPINJ\_NXP\_WDTEX\_00004538 to  
13 IMPINJ\_NXP\_WDTEX\_00004732. This document represents the circuitry contained  
14 in the Monza-X-8K product.
- 15 4. Impinj produced circuit schematics in a document titled [REDACTED].pdf that bears  
16 bates numbers IMPINJ\_NXP\_WDTEX\_00004733 to  
17 IMPINJ\_NXP\_WDTEX\_00004921. This document represents the circuitry contained  
18 in the Monza X-2K product.
- 19 5. Impinj produced circuit schematics in a document titled [REDACTED].pdf that bears  
20 bates numbers IMPINJ\_NXP\_WDTEX\_00005392 to  
21 IMPINJ\_NXP\_WDTEX\_00005625. This document represents the circuitry contained  
22 in the Monza R6-A, Monza R6-B, Monza R6-P and Monza S6-C products.
- 23 6. Impinj produced circuit schematics in a document titled [REDACTED].pdf that bears  
24 bates numbers IMPINJ\_NXP\_WDTEX\_00005626 to  
25 IMPINJ\_NXP\_WDTEX\_00006037. This document represents the circuitry contained  
26 in the Monza 5 product.
7. Impinj produced circuit schematics in a document titled [REDACTED].pdf that



- bears bates numbers IMPINJ\_NXP\_WDTEX\_00004922 to IMPINJ\_NXP\_WDTEX\_00005391. This document represents the circuitry contained in the Monza R6 product.
8. Impinj produced Verilog code in a directory named \Monza4\_verilog\. The code in this directory correlates to each of the Monza 4D, Monza 4E, Monza 4I, Monza 4QT, Monza 4E Dura, Monza 4QT Dura products.
  9. Impinj produced Verilog code in a directory named \Monza5\_verilog\. The code in this directory correlates to the Monza 5 product.
  10. Impinj produced Verilog code in a directory named \MonzaR6\_verilog\. The code in this directory correlates to each of the Monza R6, Monza R6-A, and Monza R6-B products.
  11. Impinj produced Verilog code in a directory named \MonzaR6P\_verilog\. The code in this directory correlates to each if the Monza R6-P and S6-C products.
  12. Impinj produced Verilog code in a directory named \MonzaX2K\_verilog\. The code in this directory correlates to the Monza X-2K product.
  13. Impinj produced Verilog code in a directory named \MonzaX8K\_verilog\. The code in this directory correlates to the Monza X-8K product.
  14. Impinj produced Verilog code in a directory named \M730\_M750\_verilog\. The code in this directory correlates to each of the M730 and M750 products.
  15. Impinj produced source code in a directory named \Impinj\_Speedway\_R700\_Restricted\. This directory contains subdirectories named \r700\ and \speedway\. The code in the \r700\ subdirectory correlates to the R700 product. The code in the \speedway\ subdirectory correlates to each of the Speedway R420, Speedway R220 and Speedway R120 products. The code contained within the \Impinj\_Speedway\_R700\_Restricted\ directory that is not in the \r700\ or \speedway\ subdirectories is common to the R700, Speedway R420, Speedway R220, and Speedway R120 products.

1 16. Impinj produced source code in directories named \FastID\ex10\_bundle\_v1.02.00\,  
2 \FastID\ex10\_bundle\_v1.02.00\_w\_utils\, [REDACTED], and [REDACTED].

3 The code in these directories correlates to each of the E310, E510, E710, and E910  
4 products.

5 17. Impinj produced source code in a directory named \FastID\Indy Development Kit\. The  
6 code in this directory correlates to each of the Indy RS500, Indy RS1000, and Indy  
7 RS2000 products.

8 18. Impinj produced source code in a directory named \IndyMAC\. The code in this  
9 directory correlates to each of the Indy R500, Indy R1000, and Indy R2000 products.

10 19. Impinj produced source code in a directory named \Gateway Products\. The code in  
11 this directory correlates to each of the xArray, xSpan, and xPortal products.

1 DATED this 15th day of November, 2022.

2 PERKINS COIE LLP

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